

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

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U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ALEXSANDR RABIKOV
a/k/a ALIAXSANDR RABIKAU,
and
YULIA BELOMYTTSEVA,

Defendants.

No.

4:15CR0074 CDP/TCM

INDICTMENT

COUNT ONE

Introduction

1. At all relevant times, Defendant Alexsandr Rabikov was a native of Belarus and a permanent resident of the United States residing in the Orlando, Florida and Ft. Lauderdale, Florida areas.
2. At all relevant times, Defendant Yulia Belomyttseva was a citizen of Russia residing of in the Orlando, Florida and Ft. Lauderdale, Florida area.

The Conspiracy

3. The conspiracy existed from at least February 1, 2013 through at least February 1, 2015.
4. It was the object of the conspiracy for the Defendants and others known and unknown to the Grand Jury to file fraudulent federal income tax returns, Form 1040s, Form 1040EZ's and other documents (collectively "tax returns"), in names of other individuals without lawful authority or consent of such individuals to use their names and other identifying material or to file their tax returns for the purpose of fraudulently obtaining funds of the

United States. Tax refunds sent from the United States to taxpayers purportedly entitled to the refunds represent funds of the United States.

The Manner and Means of the Conspiracy

5. It was a part of the conspiracy that Defendant Aleksandr Rabikov and others known and unknown would obtain names, social security account numbers and other identifying information and prepare or cause to be prepared false and fraudulent tax returns in the names of those individuals. In every instance, the false and fraudulent tax returns called for a refund and directed the refund to a financial account, usually a financial account of another individual. Defendant Rabikov would pay individuals cash in exchange for control of financial accounts to which the proceeds of the conspiracy were directed.
6. It was a part of the conspiracy that Defendant Rabikov enlisted Defendant Yulia Belomyttseva to collect some of those fraudulent refunds in financial accounts she controlled. Defendant Rabikov and Defendant Belomyttseva were paramours. Often, the fraudulent refunds came from other members of the conspiracy whose job it was to maintain financial accounts for the purpose of collecting the proceeds of the conspiracy. Defendant Belomyttseva would also accept proceeds of the conspiracy from Defendant Rabikov and wire those funds overseas at Defendant Rabikov's instruction.
7. It was a part of the conspiracy that, in the course of collecting identities to be used in preparing false and fraudulent tax returns, a member of the conspiracy whose identity is unknown to the Grand Jury at some point prior to February 2014 installed malicious software or "malware" on the computer equipment owned and maintained by Southern Commercial Bank, a financial institution headquartered in the Eastern District of Missouri whose relevant computer hardware is also located in the Eastern District of Missouri. This malware was designed to target financial data, conceal its purpose and location and

capture username and password data. The installation of this malware allowed the members of the conspiracy access to personal and financial information about Southern Commercial Bank personnel. This information was used to prepare and file false and fraudulent tax returns calling for refunds which were collected by members of the conspiracy including the Defendants for both the 2013 and 2014 tax years.

Overt Acts of the Conspiracy

8. On or about February 15, 2014, Defendant Rabikov directed a refund generated by a false and fraudulent tax return filed in the name of an individual whose initials are M.W. to a financial account he controlled ending in 0517 at TD Bank.
9. On or about February 15, 2014, Defendant Rabikov directed a refund generated by a false and fraudulent tax return filed in the name of an individual whose initials are B.W. to a financial account he controlled ending in 0517 at TD Bank.
10. On or about February 15, 2014, Defendant Rabikov directed a refund generated by a false and fraudulent tax return filed in the name of an individual whose initials are S.T. to a financial account he controlled ending in 0517 at TD Bank.
11. On or about February 15, 2014, Defendant Rabikov directed a refund generated by a false and fraudulent tax return filed in the name of an individual whose initials are M.J.W. to a financial account he controlled ending in 0449 at Wells Fargo.
12. On or about February 15, 2014, Defendant Rabikov directed a refund generated by a false and fraudulent tax return filed in the name of an individual whose initials are K.W. to a financial account he controlled ending in 0449 at Wells Fargo.
13. On or about April 8, 2014, Defendant Belomyttseva accepted a check in the amount of \$7,100 from Defendant Rabikov which represented proceeds of the conspiracy and deposited it in an account she controlled at Citibank.

14. Between on or about April 14, 2014 and April 18, 2014, Defendant Belomyttseva directed three wire transfers of funds to overseas financial institutions designated by and under the control of Defendant Rabikov.

Offense Conduct

15. Between at least on or about February 1, 2013 and continuing through at least on or about February 1, 2015, with the exact dates unknown to the Grand Jury,

**ALEXSANDR RABIKOV and
YULIA BELOMYTTSEVA,**

and others known and unknown to the Grand Jury, combined, conspired confederated and agrees to commit an offense against the United States, to wit: the theft of government funds in violation of Title 18, United States Code Section 641 and aggravated identity theft in violation of Title 18, United States Code Section 1028A and, during the existence of said conspiracy, one or more overt acts in furtherance and execution thereof was committed by a member of the conspiracy.

In violation of Title 18, United States Code Section 371.

A TRUE BILL

FOREPERSON

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